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12 ROBERT VACCARI, and JAKE ADAMS

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

CASE NO. 5:22-cv-00949-KK-(SHKx)

Assigned for All Purposes to:
Hon. Kenly K. Kato – Courtroom 3

**COUNTY DEFENDANTS' NOTICE
OF JOINDER AND JOINDER IN
STATE DEFENDANTS' MOTIONS
IN LIMINE NOS. 1, 3, AND 5**

Date: May 15, 2025
Time: 9:30 a.m.
Courtroom: 3

Trial Date: June 2, 2025

Complaint filed: 06/07/2022
FAC filed: 10/18/22
SAC filed: 01/13/23
TAC filed: 05/12/23

11 L.C., a minor by and through her
12 guardian *ad litem* Maria Cadena,
13 individually and as successor-in-interest
14 to Hector Puga; I.H., a minor by and
15 through his guardian *ad litem* Jasmine
16 Hernandez, individually and as
17 successor-in-interest to Hector Puga;
18 A.L., a minor by and through her
19 guardian *ad litem* Lydia Lopez,
20 individually and as successor-in-interest
21 to Hector Puga; and ANTONIA
22 SALAS UBALDO, individually,

Plaintiffs,

vs.

20 STATE OF CALIFORNIA; COUNTY
21 OF SAN BERNARDINO; S.S.C., a
22 nominal defendant; ISIAH KEE;
23 MICHAEL BLACKWOOD;
24 BERNARDO RUBALCAVA;
25 ROBERT VACCARI; JAKE ADAMS;
26 and DOES 6-10, inclusive,

Defendants.

**TO ALL PARTIES AND TO THEIR RESPECTIVE ATTORNEYS OF
RECORD:**

PLEASE TAKE NOTICE that Defendant's COUNTY OF SAN BERNARDINO, ROBERT VACCARI, and JAKE ADAMS (hereinafter "County Defendants") join in Defendants State of California, by and through California Highway Patrol, Michael Blackwood, Isaiah Kee, and Bernardo Rubalcava (hereinafter "State Defendants") motions in limine Nos. 1, 3, and 5, filed on April 15, 2025, and set for hearing on May 15, 2025, at 9:30 a.m., in Courtroom 3, before the Honorable Kenly Kiya Kato. (Dkt. Nos. 132, 140, and 141)

This joinder is based on this notice of joinder, the State Defendants' notice of motions and motions in limine Nos. 1, 3, and 5 with all supporting documents and memorandum, the Court's file in this matter, matters of which the Court may take judicial notice, and any other matter that may properly come before the Court. Based on this joinder, the County Defendants respectfully move this Court for orders:

1. excluding portions of the testimony of Plaintiffs' Expert Matthew Kimmins and excluding his videos;
2. excluding evidence and testimony concerning shooting and injuries of third parties during the subject incident; and
3. limiting the testimony of medical examiner Timothy Jong, M.D.

This joinder is made following a conference of counsel pursuant to the Court's Standing Order in Civil Actions and Local Rule 7-16, which took place on April 7 and 11, 2025.

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1 DATED: April 21, 2025

LYNBERG & WATKINS
A Professional Corporation

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4 By: /s/ Amy R. Margolies
5 **SHANNON L. GUSTAFSON**
6 **AMY R. MARGOLIES**
7 Attorneys for Defendant,
8 COUNTY OF SAN BERNARDINO
9 ROBERT VACCARI, and JAKE ADAMS
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